

## THE PATEL LAW GROUP, LLC

1995 N. Park Pl, SE, Ste 565  
Atlanta, GA 30339

April 12, 2022

Felissa Anne Grissett  
PO Box 1233  
Loris, SC 29569

RE: Bankruptcy Case No. 21-54419

Dear Mr./Mrs. Grissett:

Enclosed you will find a Notification of Intent to Request Permission to Withdraw and a Certificate of Service listing all of the parties in your case. The Patel Law Group, LLC desires to withdraw as your counsel of record.

The Motion to Withdraw will not be filed until 14 days have passed. If you have any objections to our withdrawal, you must make them known to our firm within that time period.

After the Motion to Withdraw is filed with the Clerk of the U. S. Bankruptcy Court, any objection to the Motion to Withdraw must be filed within fourteen days after service of the Motion at the Office of the Bankruptcy Clerk, U.S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, SW, Atlanta, GA 30303. Once the Court has signed the Order permitting us to withdraw, we will no longer be your Counsel of Record. You will have no counsel.

I urge you to obtain new counsel immediately. If your new counsel has any questions concerning your case, please indicate to your new counsel that he or she may feel free to contact Patel Law Group, LLC.

Respectfully,

*Rushi Patel*

Rushi Patel  
THE PATEL LAW GROUP, LLC  
1995 N Park Pl., SE, Ste 565  
Atlanta, Georgia 30339  
(404) 490-2998  
[rdp@patel-legal.com](mailto:rdp@patel-legal.com)

IN THE UNITED STATES BANKRUPTCY  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE:

Grissett, Felissa Anne,

Debtor.

Case No. 21-54419-PMB

Chapter 13

**NOTIFICATION OF INTENT TO REQUEST PERMISSION TO WITHDRAW**

This is a Notice to Felissa Anne Grissett, Debtor in the above styled bankruptcy action, from his attorney of record, The Patel Law Group, LLC (the “Law Firm”).

1.

The Patel Law Group, LLC wishes to withdraw as attorney of record for Debtor and intends to file a Motion to Withdraw due to the following facts: Debtor and the Law Firm have reached a position in which the Debtor seeks to pursue claims despite the advice of counsel – causing the Law Firm to be unable to adequately represent Debtor. Debtor through a request for hearing filed April 7, 2022 (Doc. 34), has informed the Court that she feels that the Law Firm is not acting on her behalf. In the same document, she has specifically informed the Court that the Law Firm failed to file a Change of Address as she requested – which the Law Firm filed on March 28, 2022. Additionally, Debtor has included several causes of action which she wishes to pursue through the jurisdiction of the Court which the Law Firm has informed her she is not able to do. Finally, Debtor seeks to pursue causes of action against the Chapter 13 Trustee and her mortgage lender despite advice from the Law Firm. The Law Firm is unable to pursue these causes of action either because they are outside of the scope of agreed upon representation or because the causes have no grounds.

2.

A Motion to Withdraw will be filed 14 days after the mailing of this Notification. Any objection to the Motion to Withdraw must be filed within 14 days after service of this Notification at the Office of the Bankruptcy Clerk, U.S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, SW, Atlanta, GA 30303. The Clerk's telephone number is (404) 215-1000.

3.

The Bankruptcy Court retains jurisdiction in this matter.

4.

The following parties are opposing counsel in this case:

Heather D. Bock  
McCalla Raymer Leibert Pierce LLC  
1544 Old Alabama Road  
Roswell, GA 30076  
(678) 281-6444  
678-281-6444 (fax)  
representing Village Capital & Investment, LLC

Laura A. Grifka  
McMichael Taylor Gray, LLC  
3550 Engineering Drive  
Suite 260  
Peachtree Corners, GA 30092  
404-474-7149  
lgrifka@mtglaw.com  
representing U.S. Bank National Association

A. Michelle Hart Ippoliti  
McCalla Raymer Leibert Pierce, LLC  
1544 Old Alabama Road  
Roswell, GA 30076  
678-281-6537  
678-281-6537 (fax)  
Michelle.ippoliti@mccalla.com  
representing Village Capital & Investment, LLC

Ciro A. Mestres  
McCalla Raymer Leibert Pierce, LLC  
1544 Old Alabama Road  
Roswell, GA 30076  
(678) 281-6516  
(678) 281-6516 (fax)  
Ciro.Mestres@mccalla.com  
Representing Village Capital & Investment, LLC

5.

The Trustee for this case is Melissa J. Davey, Standing Chapter 13 Trustee, Suite 2250  
233 Peachtree Street NE, Atlanta, GA 30303.

6.

If the withdrawal of The Patel Law Group, LLC is permitted

(a) Debtor will have the obligation to promptly file with the Bankruptcy  
Court and mail to the Trustee and all of his creditors or their counsel,  
a written statement showing:

- (1) the case caption and case number, and
- (2) current telephone number and mailing address, and
- (3) Debtor shall amend the statement promptly, should there  
be any changes in telephone number or mailing address;

(b) Debtor will have the obligation to respond to any discovery or  
motions, to take other actions as are appropriate or required, and to  
prepare for any trial or hearing that may be scheduled in any matter, or  
hire other counsel to do so;

(c) Debtor's failure or refusal to meet these obligations may result in  
adverse consequences;

(d) Debtor will have to complete and file with the Court any required documentation such as the Financial Management Certificate; and

(e) Service of notices, pleadings, and other papers may be made upon the Debtor at his last known address.

7.

The Patel Law Group, LLC is currently aware of the following hearings or trials in Debtor's case or any applicable deadlines:

(a) Objection to Transfer of Claim filed directly by the Debtor on April 6, 2022.

A hearing has been set for May 19, 2022 at 10:15 AM in Courtroom 1202.

Notice was served to Debtor at her address.

(b) Deadline to Complete Financial Management Course: to be completed and file 423 to be filed no later than the last payment due under Debtor's Chapter 13 Plan.

(c) Tax Returns or Tax Affidavits to be provided to the Chapter 13 Trustee for tax periods 2022 and 2023.

The holding of any hearings or trials and any deadlines will not be affected by the withdrawal of counsel.

Date: April 12, 2022

Respectfully,

THE PATEL LAW GROUP, LLC

\_\_\_\_\_/s/  
Rushi Patel, Attorney for Debtor  
Georgia Bar No. 791855  
1995 N. Park Pl. SE, Ste 565  
Atlanta, Georgia 30339  
(404) 490-2998 / [rdp@patel-legal.com](mailto:rdp@patel-legal.com)

IN THE UNITED STATES BANKRUPTCY  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE:

Grissett, Felissa Anne,

Debtor(s).

Case No. 21-54419-PMB

Chapter 13

**MOTION TO WITHDRAW**

COMES NOW The Patel Law Group, LLC, attorneys of record for Debtor, Felissa Anne Grissett, PO Box 1233, Loris, SC 29569, whose last known telephone number is 678-670-6460, and requests this Court to enter an Order allowing The Patel Law Group, LLC to withdraw as counsel herein and shows the Court the following:

1.

Debtor seeks to act in contravention to the legal advice provided by Counsel, seeks legal services outside of the scope of her agreement with Counsel, and has acted to represent herself in matters. She has informed Counsel that she is not satisfied with Counsel's representation. Furthermore, Counsel is unable to acquiesce to Debtor's requests as said requests would require Counsel to act in violation to Counsel's legal and ethical requirements.

2.

Pursuant to Bankruptcy Rule 9010-5b(1), Movant has served the Debtor, Felissa Anne Grissett, with a Notification of Intent to Request Permission to Withdraw by depositing same in the U.S. Mail, properly addressed and with sufficient postage thereon to ensure delivery. The Notification of Intention to Request Permission to Withdraw was mailed 14 days prior to filing this Motion. The Notification of Intent to Request Permission to Withdraw is attached hereto.

**WHEREFORE,** The Patel Law Group, LLC requests this Court to issue an Order permitting withdrawal as counsel for the Debtor, Felissa Anne Grissett.

Date: April 12, 2022

Respectfully,

THE PATEL LAW GROUP, LLC

/s/

Rushi Patel, Attorney for Debtor  
Georgia Bar No. 791855  
1995 North Park Pl., SE, Suite 565  
Atlanta, Georgia 30339  
(404) 490-2998  
[rdp@patel-legal.com](mailto:rdp@patel-legal.com)

IN THE UNITED STATES BANKRUPTCY  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

IN RE:

Grissett, Felissa Anne,

Debtor(s).

Case No. 21-54419-PMB

Chapter 13

**CERTIFICATE OF SERVICE**

I hereby certify that I am more than 18 years of age, and that on this day, I served a copy of the within "Notification of Intent to Request Permission to Withdraw" and "Motion to Withdraw" upon the following by depositing a copy of same in U.S. Mail with sufficient postage affixed thereon, or otherwise noted, to ensure delivery to:

Debtor: Felissa Anne Grissett, PO Box 1233, Loris, SC 29569

Electronic Notice via ECF:

Melissa J. Davey, Ch. 13 Trustee

Regular First-Class Mail:

[See Attached Matrix]

Dated: April 12, 2022

**THE PATEL LAW GROUP**

/s/ \_\_\_\_\_  
Rushi Patel, Attorney for Debtor  
Georgia Bar No. 791855  
1995 North Park Pl., SE, Suite 565  
Atlanta, Georgia 30339  
(404) 490-2998  
[rdp@patel-legal.com](mailto:rdp@patel-legal.com)



Label Matrix for local noticing  
113E-1  
Case 21-54419-pmb  
Northern District of Georgia  
Atlanta  
Tue Apr 12 16:12:03 EDT 2022

(p)1ST FRANKLIN FINANCIAL CORPORATION  
PO BOX 880  
TOCCOA GA 30577-0880

American Profit Recovery  
34505 W 12 Mile Rd Ste 333  
Farmington Hills, MI 48331-3288

BB&T NOW TRUIST  
P O BOX 1847  
WILSON  
WILSON, NC 27894-1847

Bureaus Investment Group  
c/o PRA Receivables Management  
PO Box 41021  
Norfolk, VA 23541-1021

CT Corporation System  
RA for Lendmark Financial Svcs  
289 S. Culver Street  
Lawrenceville, GA 30046-4805

(p)JPMORGAN CHASE BANK N A  
BANKRUPTCY MAIL INTAKE TEAM  
700 KANSAS LANE FLOOR 01  
MONROE LA 71203-4774

Cynthia Stephens, Manager  
Southern Management Corp.  
PO Box 1947  
Greenville, SC 29602-1947

Dovenmuehle Mortgage, Inc  
1 Corporate Drive  
Lake Zurich, IL 60047-8945

Evan Barnard  
Dunlap Gardiner LLP  
5604 Wendy Bagwell Pkwy # 923  
Hiram, GA 30141-7819

1st Franklin Financial  
135 E. Tugalo Street  
Po Box 880  
Toccoa, GA 30577-0880

1st Franklin Financial Corp.  
Admin Services  
PO Box 880  
Toccoa, GA 30577-0880

Ashley Boswell, Paralegal  
American InfoSource  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

Heather D. Bock  
McCalla Raymer Leibert Pierce LLC  
1544 Old Alabama Road  
Roswell, GA 30076-2102

Bureaus Investment Group Portfolio No 15 LLC  
c/o PRA Receivables Management, LLC  
PO Box 41021  
Norfolk VA 23541-1021

Castle Credit Co Holdings  
200 South Michigan Avenue  
Suite 450  
Chicago, IL 60604-2400

Corporate Creations Network, I  
Castle Credit Co Holdings, LLC  
2985 Gordy Parkway, 1st Fl  
Marietta, GA 30066-3078

Directv  
by American Infosource  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

Dovenmuehle Mortgage, Inc  
Attn: Bankruptcy  
1 Corporate Dr, Ste 360  
Lake Zurich, IL 60047-8945

(p)GEORGIA DEPARTMENT OF REVENUE  
COMPLIANCE DIVISION  
ARCS BANKRUPTCY  
1800 CENTURY BLVD NE SUITE 9100  
ATLANTA GA 30345-3202

1st Franklin Financial  
228 John Frank Ward Blvd  
McDonough, GA 30253-3209

Abby Petrone, Legal Mgr.  
Castle Credit Co Holdings  
200 S Michigan Ave, Ste 450  
Chicago, IL 60604-2400

BB&T Company  
Attn: Bankruptcy  
Po Box 1847  
Wilson, NC 27894-1847

(p)BB AND T  
PO BOX 1847  
WILSON NC 27894-1847

(p)SOUTHERN MANAGEMENT  
PO BOX 1947  
GREENVILLE SC 29602-1947

Castle Credit Co Holdings  
8420 W Bryn Mawr  
Chicago, IL 60631-3436

Corporation Service Company RA  
Mariner Finance, LLC  
40 Technology Pkwy South #300  
Norcross, GA 30092-2924

Directv, LLC  
by American InfoSource as agent  
4515 N Santa Fe Ave  
Oklahoma City, OK 73118-7901

Dunlap Gardiner LLP  
for Lake Iris at Williamsburg  
5604 Wendy Bagwell Pkwy # 923  
Hiram, GA 30141-7819

Geraldine Davis, CIO Team Mgr.  
IRS  
PO Box 7346 5-Q30.133  
Philadelphia, PA 19101-7346

Laura A. Grifka  
McMichael Taylor Gray, LLC  
3550 Engineering Drive  
Suite 260  
Peachtree Corners, GA 30092-2871

Heather Folse, Bank. Spec.  
Republic Finance, LLC  
282 Tower Rd  
Ponchatoula, LA 70454-8318

IRS  
Centralized Insolvency Oper.  
P. O. Box 7346  
Philadelphia, PA 19101-7346

A. Michelle Hart Ippoliti  
McCalla Raymer Leibert Pierce, LLC  
1544 Old Alabama Road  
Roswell, GA 30076-2102

JPMorgan Chase Bank, N.A.  
s/b/m/t Chase Bank USA, N.A.  
c/o Robertson, Anschutz & Schneid, P.L.  
6409 Congress Avenue, Suite 100  
Boca Raton, FL 33487-2853

(p)JEFFERSON CAPITAL SYSTEMS LLC  
PO BOX 7999  
SAINT CLOUD MN 56302-7999

Joanna Graef, Bank. Clerk  
PRA Receivables Mgmt LLC  
PO Box 41021  
Norfolk, VA 23541-1021

Katie-Lynn Murphy, Assist. Mgr  
Mariner Finance, LLC  
8211 Town Center Drive  
Nottingham, MD 21236-5904

Kristi J Cheek, Admin  
1st Franklin Financial Corp  
PO Box 880  
Toccoa, GA 30577-0880

Lake Iris at Williamsburg Plantation  
Homeowners Assoc., Inc.  
c/o Dunlap Gardiner LLP  
5604 Wendy Bagwell Pkwy Ste 923  
Hiram, GA 30141-7819

Latosha A Moody, AVP  
Branch Banking and Trust Co.  
PO Box 1847, 100-50-01-51  
Wilson, NC 27894-1847

(p)LENDMARK FINANCIAL SERVICES  
2118 USHER ST  
COVINGTON GA 30014-2434

Lendmark Financial Services  
Attn: Bankruptcy  
1735 North Brown Rd, Ste 300  
Lawrenceville, GA 30043-8228

Maria Tsagaris  
McCalla Raymer Leibert Pierce  
1544 Old Alabama Rd  
Roswell, GA 30076-2102

Mariner Finance, LLC  
1429 Goodman Road  
Horn Lake, MS 38637-1404

Mariner Finance, LLC  
8211 Town Center Drive  
Nottingham, MD 21236-5904

Mariner Finance, LLC  
Attn: Bankruptcy  
8211 Town Center Drive  
Nottingham, MD 21236-5904

Ciro A. Mestres  
McCalla Raymer Leibert Pierce, LLC  
1544 Old Alabama Road  
Roswell, GA 30076-2102

Midwest Recovery Systems  
514 Earth City Plaza  
Earth City, MO 63045-1303

Midwest Recovery Systems  
Po Box 899  
Florissant, MO 63032-0899

NPRT0 Georgia, LLC  
265 West Data Drive  
Draper, UT 84020

Nathalie Rodriguez, Agent  
Robertson, Anschutz & Schneid  
6409 Congress Ave., Ste 100  
Boca Raton, FL 33487-2853

Navient  
Attn: Bankruptcy  
P.O. Box 9640  
Wilkes Barre, PA 18773-9640

Navient  
Po Box 3229  
Wilmington, DE 19804-0229

Navy Federal Credit Union  
Jessica Arestad, Bank. Spec.  
PO Box 3000  
Merrifield, VA 22119-3000

Navy Federal Credit Union  
P.O.BOX 3000  
MERRIFIELD, VA 22119-3000

Rushi D. Patel  
The Patel Law Group, LLC  
1995 North Park Place, SE  
Suite 565  
Atlanta, GA 30339-2240

(p)REPUBLIC FINANCE LLC  
282 TOWER RD  
PONCHATOULA LA 70454-8318

Robertson, Anschutz & Schneid  
for JPMorgan Chase Bank  
6409 Congress Ave, Suite 100  
Boca Raton, FL 33487-2853

Sally Beltran, Bank. Spec.  
Westlake Financial Services  
4751 Wilshire Blvd, Suite 100  
Los Angeles, CA 90010-3847

Shannon Parker, Bank. Manager  
World Acceptance Corp  
PO Box 6429  
Greenville, SC 29606-6429

(p)STALLINGS FINANCIAL GROUP  
ATTN JANET  
407 ATLANTA ST  
MARIETTA GA 30060-2226

U.S. Bank National Association  
C/O Rushmore Loan Management Services  
P.O. Box 52708  
Irvine CA 92619-2708

USAA Federal Savings Bank  
10750 Mcdermott Freeway  
San Antonio, TX 78288-1600

USAA Savings Bank  
9800 Fredericksburg Rd  
San Antonio, TX 78288-0002

United States Attorney  
Northern District of Georgia  
75 Ted Turner Drive SW, Suite 600  
Atlanta GA 30303-3309

Village Capital & Investment  
1 Corporate Drive, Ste 360  
Lake Zurich, IL 60047-8945

Village Capital & Investment, LLC  
Bankruptcy Department  
1 Corporate Drive  
Suite 360  
Lake Zurich, IL 60047-8945

(p)WESTGATE RESORTS  
ATTN MANDY BUSKIRK  
2801 OLD WINTER GARDEN ROAD  
OCOE FL 34761-2965

Westlake Financial Services  
4751 Wilshire Blvd, Ste 100  
Los Angeles, CA 90010-3847

Westlake Financial Services  
Attn: Bankruptcy  
Po Box 76809  
Los Angeles, CA 90076-0809

Westlake Services, LLC  
Jefferson Capital Systems LLC Assignee  
Po Box 7999  
Saint Cloud MN 56302-7999

World Acceptance Corp  
PO Box 6429  
Greenville, SC 29606-6429

World Acceptance/World Finance  
2640b Metropolitan Pkwy  
Atlanta, GA 30315-7921

World Acceptance/World Finance  
Attn: Bankruptcy  
Po Box 6429  
Greenville, SC 29606-6429

World Finance Company of Georg  
Attn: CT Corporation System, R  
289 S. Culver St  
Lawrenceville, GA 30046-4805

World Finance c/o World Acceptance Corp.  
Attn: Bankruptcy Processing Center  
PO Box 6429  
Greenville, SC 29606-6429

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4) .

1st Franklin Financial Corp  
Attn: Virginia Herring, CEO  
135 E Tugalo Street  
Toccoa, GA 30577

Branch Banking & Trust  
BB&T now Truist  
P.O. Box 1847, 100-50-01-51  
Wilson, NC 27894

COVINGTON CREDIT GA0012  
c/o SOUTHERN MANAGEMENT  
ATTN BK  
PO BOX 1947  
GREENVILLE, SC 29602

Chase Card Services  
PO Box 15298  
Wilmington, DE 19850

(d)Chase Card Services  
Po Box 15369  
Wilmington, DE 19850

(d)Covington Credit  
PO Box 1947  
Greenville, SC 29602

Georgia Dept. of Rev.  
Compl. Div. - ARCS Bankruptcy  
1800 Century Blvd NE, Ste 9100  
Atlanta, GA 30345

Jefferson Capital Systems, LLC  
PO Box 7999  
Saint Cloud, MN 56302

Lendmark Financial Services  
2118 Usher St.  
Covington, GA 30014

(d)Lendmark Financial Services, LLC  
2118 Usher Street  
Covington, GA 30014

Republic Finance, LLC  
282 Tower Rd  
Ponchatoula, LA 70454

(d)Republic Finance, LLC  
282 Tower Rd  
Ponchatoula, La 70454

Stallings Financial Group  
1111 S. Marietta Parkway Ste B  
Marietta, GA 30060

(d)Stallings Financial Group, Inc  
PO Box 4430  
Marietta, GA 30061

Westgate Resorts  
5601 Windhover Drive  
Orlando, FL 32819

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(d)Navy Federal Credit Union  
PO Box 3000  
Merrifield, VA 22119-3000

End of Label Matrix	
Mailable recipients	76
Bypassed recipients	1
Total	77